REMARKS

Claims 1-8 and 10-19 are pending in the present application. By this reply, claim 9 has been cancelled. Claims 1 and 6 are independent. The claims have been amended to correct minor informalities and to clarify the invention. These modifications do not add new matter.

Claim Objection

Claims 3, 4, 10 and 11 have been objected to because of minor informalities. These claims have been reviewed and amended to correct these informalities as suggested by the Examiner. Accordingly, this objection should be withdrawn.

35 U.S.C. § 102 and § 103 Rejection

Claims 1 and 6 have rejected under 35 U.S.C. § 102(e) as being anticipated by Abu-Husein. Claims 2, 3 and 5 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Abu-Husein as applied to claim 1 above and further in view of Silverbrook. Claims 4 and 15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Abu-Husein as applied to claim 1 above and further in view of Siwinski. Claims 7 and 8 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Abu-Husein as applied to claim 6 above and further in view of Silverbrook. Claim 9 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Abu-Husein as applied to claim 6 above and further in view of Imai. Claims 10 and 11 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Abu-Husein and Silverbrook as applied to claim 8 above and further in view of Kurata et al. Claims 12 and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Abu-Husein as applied to claims 1 and 6 above and further in view of Kurata et al. Claims 13-14 and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Abu-Husein and Silverbrook as applied to claim 1 above and further in view of Kurata et al. Claims 18 and 19 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Abu-Husein and Silverbrook as applied to claim 6 above

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and further in view of Kurata et al. These rejections, insofar as they pertain to the presently pending claims, are respectfully traversed.

Without acquiescing to any of the Examiner's allegations made in rejecting these claims, independent claims 1 and 6 have been amended to incorporate generally the subject matter of claim 9 to further emphasize the distinguishing features of the present invention over the prior art of record. As amended, the invention of independent claims 1 and 6 relates to downloading a new set of printing parameters from the URI directly to the printer each time a predetermined interval has elapsed. Support for this feature can be found in steps S2-S5 of Figure 3 and the corresponding description in the filed specification. This feature allows the printer to check for the availability of any updated printing parameters at the storage device over the Internet at certain intervals and thus allows the updating of the printing parameters independent of the change of the component itself. This is one of the advantages of the present invention since this allows printing parameters pertinent to a specific functional component (e.g., a nozzle head, an ink cartridge, an LED array, etc.) of the printer to be modified even after the functional component has been delivered or installed in the printer; see, e.g., page 3, lines 14-29 of the specification. The above noted features of independent claims 1 and 6 are neither taught nor suggested by the applied references.

More specifically, the primary reference, Abu-Husein, is directed to transferring the printer configuration settings from the printer 38 to the web server. That is, Abu-Husein uploads the printer configuration data from the printer to the server. This is the opposite of downloading data from the server to the printer. For instance, Abu-Husein states on column 5, lines 15-18 that "Every time a user changes the settings on printer 38, the dynamic loading mechanism 48 will surf to servlet 76 to update the configuration settings for printer 38".

Furthermore, in Abu-Husein, the printer configuration settings uploaded from the printer to the server are not "a set of printing parameters, which is adapted to a specific functional component of the printer" as required by claim 1. Claim 6 recites similar features in a varying scope. In clear contrast, in Applicant's invention, the printing parameters pertain to a specific functional component of the printer. This feature is complete absent from Abu-Husein.

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Moreover, none of the secondary reference(s) as applied overcome these deficiencies in Abu-Husein. For instance, Imai relates to updating printing firmware where a printer in a network looks up if its version of the firmware is the same as the version of firmware in other printers. However, firmware is not and cannot be equated to the printing parameters recited in claims 1 and 6. Firmware is a program code and the updates are necessary because of bug-fixing. Imai's firmware is not adapted to (or pertains to) a specific function component of the printer, but it is generic. In contrast, in Applicant's invention, the printing parameters, which are downloaded from a URI to the printer, pertain to a specific functional component of the printer. Also, in Imai, there is no central storage device (at a URI) as in Applicant's invention. Instead, Imai's storage device is a peer printer in the network.

Silverbrook is directed to remotely downloading a new defect list from the manufacturing database to the printer controller using the new printhead cartridge's barcode. The defect list is associated with a redundant printhead and is stored in the manufacturing data base. However, the defect list is associated with the static characteristics of the printhead, which are stored in the database. Accordingly, in Silverbrook, the same static data will always be associated with the specific print head for the lifetime of the print head. In contrast, Applicant's invention pertains to downloading a new set of parameters each time a predetermined time has elapsed and thus does not involve downloading the same static data as in Silverbrook.

The other secondary references do not overcome the deficiencies in Abu-Husein alone or in the combination of Abu-Husein with Silverbrook and/or Imai. Further, these references were merely relied upon by the Examiner for the features recited in some dependent claims.

Accordingly, even if the references were combinable assuming *arguendo*, Abu-Husein (alone or) in combination with the secondary reference(s) neither teaches nor suggests the invention as set forth in independent claims 1 and 6. Therefore, independent claims 1 and 6 and their dependent claims (due to the dependency) are patentable over the applied references, the rejections are improper and should be withdrawn.
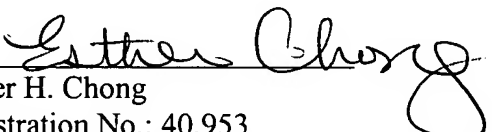
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Conclusion

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Esther H. Chong Reg. No. 40,953 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

By _____
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